

SERFF Tracking Number: HRTD-125831779 State: Arkansas
Filing Company: ING Life Insurance and Annuity Company State Tracking Number: 40489
Company Tracking Number:
TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
Variable and Variable
Product Name: E-MMINCENTIVE-08
Project Name/Number: /

Filing at a Glance

Company: ING Life Insurance and Annuity Company

Product Name: E-MMINCENTIVE-08 SERFF Tr Num: HRTD-125831779 State: ArkansasLH

TOI: A02.1G Group Annuities - Deferred Non- SERFF Status: Closed State Tr Num: 40489
Variable and Variable

Sub-TOI: A02.1G.002 Flexible Premium Co Tr Num: State Status: Approved-Closed

Filing Type: Form Co Status: Reviewer(s): Linda Bird

Author: William Barna Disposition Date: 10/17/2008

Date Submitted: 10/08/2008 Disposition Status: Approved

Implementation Date Requested: On Approval Implementation Date:

State Filing Description:

General Information

Project Name: Status of Filing in Domicile: Pending

Project Number: Date Approved in Domicile:

Requested Filing Mode: Review & Approval Domicile Status Comments:

Explanation for Combination/Other: Market Type: Group

Submission Type: New Submission Group Market Size: Small and Large

Overall Rate Impact: Group Market Type: Employer

Filing Status Changed: 10/17/2008

State Status Changed: 10/17/2008

Corresponding Filing Tracking Number:

Filing Description:

RE: ING Life Insurance and Annuity Company

NAIC #229-86509, FEIN # 71-0294708

Endorsement: E-MMINCENTIVE-08

Deemer Date:

By this description and related materials, ING Life Insurance and Annuity Company hereby submits the above-captioned form for your review and approval.

<i>SERFF Tracking Number:</i>	<i>HRTD-125831779</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>ING Life Insurance and Annuity Company</i>	<i>State Tracking Number:</i>	<i>40489</i>
<i>Company Tracking Number:</i>			
<i>TOI:</i>	<i>A02.1G Group Annuities - Deferred Non-Variable and Variable</i>	<i>Sub-TOI:</i>	<i>A02.1G.002 Flexible Premium</i>
<i>Product Name:</i>	<i>E-MMINCENTIVE-08</i>		
<i>Project Name/Number:</i>	<i>/</i>		

The Company will use endorsement form E-MMINCENTIVE-08 with G-CDA(12/99) and C-CDA(12/09), a group annuity contract and certificate, respectively, which your Department previously approved on December 13, 1999. Form E-MMINCENTIVE-08 endorses these forms to allow the Company to offer a marketing incentive program when we use the forms in connection with a new product that we intend to sell in the Education market. Enrollment in the new product, which we currently intend to call "ING Educator's Direct," will only be available electronically, through our Internet enrollment system. Whenever the incentive program for the ING Educator's Direct product is active, employees who enroll to become participants under the contract (referred herein as "new ING Educator's Direct participants") are eligible to receive an incentive amount (not to exceed \$25). The program may provide the incentive amount in the form of a cash equivalent (e.g., a gift card) or an addition to the new ING Educator's Direct participant's individual account under the contract.

The Company will base the decision of whether or not to offer an incentive amount to new ING Educator's Direct participants in your jurisdiction on marketing goals. However, the Company will administer the incentive program for this product on a strictly non-discriminatory basis. Accordingly, regardless of whether we, from time to time, activate, suspend or permanently terminate this incentive program, we will apply our incentive program for this product equally to all new ING Educator's Direct participants under all new and existing ING Educator's Direct contracts delivered in your jurisdiction. For example, if we decide to activate the program for the ING Educator's Direct product in your jurisdiction on a particular date (following approval of the endorsement now being filed), it will be offered to all new ING Educator's Direct participants in your jurisdiction.

The endorsement form is new and does not represent a replacement of any previously approved form. We have submitted the endorsement in final printed form, subject to only minor modification in paper stock, ink, border, company logo, adaptation to computer printing and the possible inclusion of a barcode. The form achieved a 51.1 Flesch readability score. The Company will file the endorsement in most jurisdictions where we are licensed to do business; however, we may delay filing in a few jurisdictions where we will not be marketing this product in the immediate future.

For your information, this is also to inform you of two product-specific accommodations we have made to a previously provided list of variable provisions (also known as "Appendix A") for the contract and certificate referred to above. We are expanding two Appendix A items to accommodate certain features of the ING Educator's Direct product. Specifically: (a) The Investment Options offered by ING Educator's Direct during the Accumulation Phase consist of a

<i>SERFF Tracking Number:</i>	<i>HRTD-125831779</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>ING Life Insurance and Annuity Company</i>	<i>State Tracking Number:</i>	<i>40489</i>
<i>Company Tracking Number:</i>			
<i>TOI:</i>	<i>A02.1G Group Annuities - Deferred Non-Variable and Variable</i>	<i>Sub-TOI:</i>	<i>A02.1G.002 Flexible Premium</i>
<i>Product Name:</i>	<i>E-MMINCENTIVE-08</i>		
<i>Project Name/Number:</i>	<i>/</i>		

number of Funds, available through the Contract's Separate Account (no Fixed Interest Options are offered), and (b) The several Annuity Options available under ING Educator's Direct during the Annuity Phase are all in the form of a fixed Annuity (no variable Annuity is offered).

The following Appendix A items are substituted for the corresponding items from the existing Appendix A, for use with ING Educator's Direct only.

Appendix A. Variable Provisions

Contract Schedule/Title: Contract Schedule I: Fixed Interest Options Available

Variation(s)/Parameters of Brackets:

The schedule will show one or more of the following options, or will show "None":

- Fixed Account
- Fixed Account for transferred amounts only (no ongoing Contributions)
- Fixed Plus Account
- Guaranteed Accumulation Account(GAA)

When Used/When Changed: One or more of the options may be available under the Contract.

Contract Schedule/Title: Contract Schedule II: Maximum Number of Funds

Variation(s)/Parameters of Brackets: The bracketed number is the number of funds that our administrative system can presently support for a given product. This may range for as many as four to as few as zero, the latter indicating no funds available for the product in question and that therefore only a fixed Annuity is available under that particular product.

When Used/When Changed: If appropriate for the given product and if we are able to modify our administrative system to support more funds in the future, we may increase the number.

If you have any questions or require any additional information, please do not hesitate to contact William Barna at (860) 580-2789, toll free at (800) 654-8065 (Ext. 580-2789) or by email at william.barna@us.ing.com.

SERFF Tracking Number: HRTD-125831779 State: Arkansas
 Filing Company: ING Life Insurance and Annuity Company State Tracking Number: 40489
 Company Tracking Number:
 TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
 Variable and Variable
 Product Name: E-MMINCENTIVE-08
 Project Name/Number: /

Company and Contact

Filing Contact Information

William Barna, Contract Consultant William.Barna@us.ing.com
 One Orange Way (860) 580-2789 [Phone]
 Windsor, CT 06095 (860) 580-4842[FAX]

Filing Company Information

ING Life Insurance and Annuity Company CoCode: 86509 State of Domicile: Connecticut
 One Orange Way Group Code: 229 Company Type:
 Windsor, CT 06095 Group Name: State ID Number:
 (800) 654-8065 ext. [Phone] FEIN Number: 71-0294708

Filing Fees

Fee Required? Yes
 Fee Amount: \$20.00
 Retaliatory? No
 Fee Explanation: 1 endorsement form @ \$20.00 each
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
ING Life Insurance and Annuity Company	\$20.00	10/08/2008	23051801

SERFF Tracking Number:	HRTD-125831779	State:	Arkansas
Filing Company:	ING Life Insurance and Annuity Company	State Tracking Number:	40489
Company Tracking Number:			
TOI:	A02.1G Group Annuities - Deferred Non-Variable and Variable	Sub-TOI:	A02.1G.002 Flexible Premium
Product Name:	E-MMINCENTIVE-08		
Project Name/Number:	/		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Linda Bird	10/17/2008	10/17/2008

<i>SERFF Tracking Number:</i>	<i>HRTD-125831779</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>ING Life Insurance and Annuity Company</i>	<i>State Tracking Number:</i>	<i>40489</i>
<i>Company Tracking Number:</i>			
<i>TOI:</i>	<i>A02.1G Group Annuities - Deferred Non-Variable and Variable</i>	<i>Sub-TOI:</i>	<i>A02.1G.002 Flexible Premium</i>
<i>Product Name:</i>	<i>E-MMINCENTIVE-08</i>		
<i>Project Name/Number:</i>	<i>/</i>		

Disposition

Disposition Date: 10/17/2008

Implementation Date:

Status: Approved

Comment:

Rate data does NOT apply to filing.

<i>SERFF Tracking Number:</i>	<i>HRTD-125831779</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>ING Life Insurance and Annuity Company</i>	<i>State Tracking Number:</i>	<i>40489</i>
<i>Company Tracking Number:</i>			
<i>TOI:</i>	<i>A02.1G Group Annuities - Deferred Non-Variable and Variable</i>	<i>Sub-TOI:</i>	<i>A02.1G.002 Flexible Premium</i>
<i>Product Name:</i>	<i>E-MMINCENTIVE-08</i>		
<i>Project Name/Number:</i>	<i>/</i>		

Item Type	Item Name	Item Status	Public Access
Supporting Document	Certification/Notice		Yes
Supporting Document	Application		Yes
Supporting Document	Life & Annuity - Acturial Memo		No
Form	Endorsement		Yes

SERFF Tracking Number: HRTD-125831779 State: Arkansas

Filing Company: ING Life Insurance and Annuity Company State Tracking Number: 40489

Company Tracking Number:

TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
Variable and Variable

Product Name: E-MMINCENTIVE-08

Project Name/Number: /

Form Schedule

Lead Form Number: E-MMINCENTIVE-08

Review Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	E-MMINCENTIVE-08	Policy/Cont Endorsement	ract/Fratern al Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		51	E-MMINCENTIV E-08.pdf

ING Life Insurance and Annuity Company

ENDORSEMENT

The Contract, and the Certificate, if applicable, is endorsed as follows:

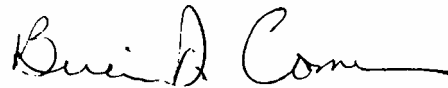
The Company may offer a program that would provide Participants under the Contract with an incentive amount not to exceed \$25 (herein called the incentive amount) in the form of a cash equivalent (e.g., a gift card) upon the establishment of the Participant's Individual Account. Alternatively, the Company may adjust the Participant's Individual Account upon its establishment by adding the incentive amount to said Individual Account.

If the incentive amount is added to the Participant's Individual Account, the Company will:

1. Allocate the incentive amount among the Investment Options in the same manner as Contributions are allocated (i.e., as directed by the Contract Holder or the Participant, as applicable), and
2. Include the incentive amount in the Participant's Individual Account Value.

The Company may activate, suspend, or terminate the incentive program described herein at any time, provided it will do so uniformly with regard to all Contracts delivered under the jurisdiction of any given State or the District of Columbia, as applicable.

Endorsed and made a part of the Contract, and Certificate, if applicable, on the Contract Effective Date.

A handwritten signature in black ink, appearing to read "Bruce A. Com", with a long horizontal flourish extending to the right.

President
ING Life Insurance and Annuity Company

<i>SERFF Tracking Number:</i>	<i>HRTD-125831779</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>ING Life Insurance and Annuity Company</i>	<i>State Tracking Number:</i>	<i>40489</i>
<i>Company Tracking Number:</i>			
<i>TOI:</i>	<i>A02.1G Group Annuities - Deferred Non-Variable and Variable</i>	<i>Sub-TOI:</i>	<i>A02.1G.002 Flexible Premium</i>
<i>Product Name:</i>	<i>E-MMINCENTIVE-08</i>		
<i>Project Name/Number:</i>	<i>/</i>		

Rate Information

Rate data does NOT apply to filing.

SERFF Tracking Number: HRTD-125831779 State: Arkansas
Filing Company: ING Life Insurance and Annuity Company State Tracking Number: 40489
Company Tracking Number:
TOI: A02.1G Group Annuities - Deferred Non- Sub-TOI: A02.1G.002 Flexible Premium
Variable and Variable
Product Name: E-MMINCENTIVE-08
Project Name/Number: /

Supporting Document Schedules

Review Status:

Satisfied -Name: Certification/Notice

09/24/2008

Comments:

Attachment:

AR Cert.pdf

Review Status:

Satisfied -Name: Application

09/24/2008

Comments:

Endorsement E-MMINCENTIVE-08 is to be used with the forms stated in the Filing Description (under the General Information tab); the application to be used with those forms is 300-MOP-02, previously approved by your Department on May 7, 2002.

STATE OF ARKANSAS
CERTIFICATION OF COMPLIANCE

CARRIER: ING Life Insurance and Annuity Company

FORM NUMBER(S)

FORM TITLE(S)

E-MMINCENTIVE-08

Endorsement

I hereby certify that to the best of my knowledge and belief the above form submission complies with Rule and Regulation 19s10 as well as all applicable requirements for the State of Arkansas.

William J. Barna

Signature of Officer or Representative

William J. Barna

Name

Contract Analyst

Title and/or Business Affiliation

10/08/2008

Date